

### REMARKS

The Amendment is fully responsive to the non-final Office Action dated May 13, 2008, issued in connection with the above-identified application. Claims 1-17 are all the claims pending in the present application. With this Amendment, claims 1-17 have been amended. No new matter has been introduced by the amendments made to the claims. Favorable reconsideration is respectfully requested.

To facilitate the Examiner's reconsideration of the application, the Applicants have provided amendments to the specification and the abstract. The changes to the specification and the abstract include minor editorial and clarifying changes. Replacement paragraphs and a replacement abstract are provided to show the changes made to the original specification and abstract. No new matter has been introduced by the amendments made to the specification and the abstract.

In the Office Action, the drawings and the specification have been objected to because of minor informalities. Specifically, Fig. 1A has been objected for failure to include a "prior art" legend, and the specification has been objected to because of a minor typographical error.

The Applicants have included herein a replacement sheet for Fig. 1A, which includes the "prior art" legend requested by the Examiner. Additionally, the replacement abstract provided herein also corrects the typographical error noted by the Examiner. Accordingly, withdrawal of the objections to the drawings and specification is respectfully requested.

In Office Action, claims 16 and 17 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Specifically, the Examiner alleges that claims 16 and 17 appear to be claiming both a product and a process which is confusing. Additionally, the Examiner alleges that claim 17 fails to include the term "comprising."

With regard to claim 16, the claim has been amended to point out that the "computer-readable program is stored on a computer-readable medium for causing a display process device to execute display process steps." (Emphasis added). Claim 16 (as amended) now more clearly recites the functional and structural interrelationship between the program being claimed and the display process device such that the functionality of the program can be realized. Additionally, the Applicants respectfully point out that claim 17 presently recites "[t]he program according to

claim 16 further comprising:..." (Emphasis added). Accordingly, claim 17 is not missing the word "comprising," as suggested by the Examiner. Withdrawal of the rejection under 35 U.S.C. 112, second paragraph, is respectfully requested.

In the Office Action, claims 1-11, 16 and 17 have been rejected under 35 U.S.C. 101 for being directed to non-statutory subject matter. Specifically, the Examiner alleges that claims 1-11, 16 and 17 are directed to a program itself, not a process occurring as a result of executing the program, a machine programmed to operate in accordance with the program or a manufacture structurally and functionally interconnected with the program in a manner which would enable the program to act as a computer component to realize its functionality.

With regard to claim 1, the Applicants note that the claim has been amended to point out that the display process device is operable to execute a program stored on a computer-readable medium that causes the display processing device to display a screen on a display, comprising:.... Thus, claim 1, as amended, is now directed to patentable subject matter.

With regard to claim 12, the Applicants assert that the claim is directed to a method or process, not a program; and a method or process clearly falls into one of the four enumerated categories of patentable subject matter.

Finally, with regard to claim 16, the claim has been amended to point out that the "computer-readable program is stored on a computer-readable medium for causing a display process device to execute display process steps." (Emphasis added). Claim 16 (as amended) now clearly recites the functional and structural interrelationship between the program and the display process device such that the functionality of the program can be realized. Withdrawal of the rejection to the above claims under 35 U.S.C. 101 is respectfully requested.

In the Office Action, claims 1-17 have been rejected under 35 U.S.C. 102(b) as being anticipated by Shin et al. (U.S. Patent No. 5,801,696). The Applicants respectfully point out that U.S. Patent No. 5,801,696 was granted to Roberts, not Shin. Therefore, hereafter U.S. Patent No. 5,801,696 will be referred to as "Roberts."

Claims 1-17 have been amended to address the Examiner's rejections under 35 U.S.C. 112, second paragraph; and 35 U.S.C. 101. Additionally, claims 1-17 have been amended to

place the claims in better form for U.S. patent practice. However, no claims have been amended to address any prior art rejections by the Examiner (i.e., under 35 U.S.C. 102(b)). The Applicants maintain that the cited prior art fails to disclose or suggest all features of independent claims 1, 12 and 16, as originally filed. For example, independent claim 1 recites the following features:

“[a] display process device operable to execute a program stored on a computer-readable medium that causes the display processing device to display a screen on a display, comprising:

an information storage section storing screen definition information defining a correlation between a screen displayed on the display and an action corresponding to an instruction indicated in the screen;

a screen definition information interpretation section interpreting the screen definition information, generating a screen which is to be displayed on the display, and, in accordance with an instruction given thereto, issuing a first screen event for the action corresponding to the instruction;

a first event conversion section converting the first screen event to a first device event, which may be interpreted and executed by a device resource retained by the display process device; and

a device resource control section controlling the device resource based on the first device event converted in said first event conversion section.”

The features noted above in independent claim 1 are similarly recited in independent claims 12 and 16. Specifically, independent claim 12 is a method and independent claim 16 is a program, which both recite steps directed to similar features of the device of claim 1. Additionally, the features noted above are fully supported by the Applicants’ disclosure (e.g., Fig. 1B, Fig. 5A, Fig. 5B, ¶ [0017] and ¶ [0024]).

The present invention (as recited in claims 1, 12 and 16) is directed to a conversion section 3, which is responsible for converting an event going between a screen section 1 and the control section 2, so that the event is sent to a receiver after the event is converted into a form which can be easily interpreted by the receiver. Thus, if a conversion rule for the conversion section 3 is pre-set,

the designer and the programmer will be able to design freely without being constrained by the design of the other.

Conversely, in a conventional system, a screen section (e.g., a GUI player) controlled by a designer and a control section (e.g., an application) controlled by a programmer are designed such that the screen section and the control section are mutually constrained by one another (e.g., Fig. 1A). Therefore, modifying a design of the screen section or the control section affects the design of the other. Therefore, it is difficult for the screen section or the control section to be applied individually to another system.

In the Office Action, the Examiner relies on Roberts for disclosing or suggesting all the features recited in independent claims 1, 12 and 16. Roberts is directed to a data processing system arranged to run a plurality of applications, wherein each application is associated with one or more windows under the control of a user interface provided by the system. Specifically, in Roberts, a storage device 380 includes an input device categorization 385 and window location information 390. The input device categorization 385 categorizes input devices. As described in the embodiment shown in FIG 4 of Roberts, a mouse 322 and a stylus 326 are registered as pointing devices and a keyboard 320 and a microphone 324 are registered as non-pointing devices on the input device categorization 385. And, window location information 390 includes a latest window position of a display device 310.

Additionally, in Roberts, a routing means 100 receives events which a user inputs via an input means 300, and based on the list registered in the input device categorization 385, communicates the inputted events to a first set of queues 360 and a second set of queues 370. The events inputted by the pointing devices are stored in the first set of queues 360 and the events inputted by the non-pointing devices are stored in the second set of queues 370. The events in the first set of queues 360 are processed by sub-dispatchers 120 and displayed (i.e., as is) in the associated window. A transfer means 395 closes the currently open queue for the non-pointing device in question, and instructs the generation means 350 to create a new queue. As a result, an event of the device (in an appropriate queue) is processed by the sub-dispatchers 120 and displayed in the associated window.

Based on the above discussion, the present invention (as recited in claims 1, 12 and 16) is distinguishable over Robert for at least the reasons noted below.

First, the input device categorization 385 of Roberts is implemented to define categories of the input devices. On the other hand, the screen definition information of the present invention defines a relationship between the screen displayed on the display and an operation which corresponds to an instruction displayed on the screen. Therefore, Roberts is only capable of categorizing the input devices, whereas the present invention performs each process in accordance with each of the inputted instructions, irrespective of the categories of the input devices.

Second, the routing means 100 of Roberts merely stores the events in the first set of queues 360 or the second set of queues 370 by referring to the list in the input device categorization 385. On the other hand, the screen definition information interpretation section of the present invention creates a screen displayed on the display by referring to the screen definition information and issues a first screen event showing an operation which corresponds to an instruction displayed on the screen.

Third, the transfer means 395 of Roberts is implemented to open and close the queue or to create a new queue. On the other hand, the first event conversion section of the present invention converts a first screen event to a first device event which a device resource retained by the display process device is able to interpret and execute. Thus, an advantage of the present invention is that it provides a description of information, or the like (e.g., for starting another application which is operable in an apparatus) for using a function retained by another application, or for modifying a display of a key guidance letting a user (i.e., who is operating the apparatus) know about a next action. No such advantages are disclosed or suggested by Roberts.

Finally, the object of the invention disclosed in Roberts and the object of the present invention are clearly different. Specifically, the object of the invention disclosed in Roberts is to provide a configuration that allows the categorization of the input devices. On the other hand, an object of the present invention is to use a GUI content and a GUI player, which are created for another system, without changing an application (by generating the above-mentioned first screen

event) irrespective of the categories of the input devices.

Based on the above discussion, independent claims 1, 12 and 16 are not anticipated or rendered obvious over Roberts. Likewise, claims 2-9, 13-15 and 17 are not anticipated or rendered obvious over Roberts at least by virtue of their respective dependences from independent claims 1, 12 and 16.

In light of the above, the Applicants respectfully submit that all the pending claims are patentable over the prior art of record. The Applicants respectfully request that the Examiner withdraw the rejections presented in the Office Action dated May 13, 2008, and pass the application to issue. The Examiner is invited to contact the undersigned attorney by telephone to resolve any remaining issues.

Respectfully submitted,

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